

SAMUEL BERNARD JOHNSON III
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Plaintiff - *In Pro Se*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

SAMUEL BERNARD JOHNSON III,

Plaintiff,

vs.

CHEVRON CORPORATION, a Delaware
corporation, CHEVRON ENVIRONMENTAL
MANAGEMENT COMPANY, a California
corporation, and DOES 1-10,

Defendants

Case No.: C 07-05756 SI (JCS)

**NOTICE OF MOTION OF PLAINTIFF'S
MOTION TO COMPEL DISCOVERY
FROM DEFENDANTS CHEVRON
CORPORATION, CHEVRON
ENVIRONMENTAL MANAGEMENT
COMPANY, THEIR ATTORNEY
OF RECORD AND REQUEST FOR
SANCTIONS**

DATE: Friday, September 12, 2008

TIME: 9:30 a.m.

COURTROOM: A, 15th Floor

JUDGE: Hon. Magistrate Joseph C. Spero

NOTICE OF MOTION OF PLAINTIFF'S MOTION TO COMPEL DISCOVERY AND REQUEST
FOR SANCIONS, CASE NO. C 07-05756 SI (JCS)

**TO DEFENDANTS CHEVRON CORPORATION, CHEVRON
ENVIRONMENTAL MANAGEMENT COMPANY AND THEIR ATTORNEY OF
RECORD:**

PLEASE TAKE NOTICE that on Friday, September 12, 2008, at 9:30 a.m. or as soon thereafter as the matter may be heard, before the Honorable Magistrate Judge Joseph C. Spero, located at the United States District Court, Northern District of California, San Francisco Division, 450 Golden Gate Avenue, Courtroom A, 15th Floor, San Francisco, California 94102, Samuel Bernard Johnson III (hereinafter referred to as "Plaintiff Johnson") will and hereby do move for an order granting Plaintiff Johnson's Motion to Compel Discovery and Request for Sanctions in this action.

Plaintiff Johnson makes this Motion to Compel Discovery and Request for Sanctions pursuant to Federal Rule of Civil Procedure 37 and Civil Local Rules 7, 7-6 and 7-8, on the grounds that Delia A. Isvoranu, Esq. of Filice Brown and Eassa LLP, (hereinafter referred to as "Counsel for Chevron") and Defendants Chevron Corporation and Chevron Environmental Management Company, (hereinafter referred to as the "Chevron Defendants" have withheld relevant discovery that will lead to admissible evidence as well as will assist Plaintiff Johnson in calculating damages in this action. Plaintiff Johnson further contends that the withheld discovery is needed in order to take several employees depositions as well as 30(b) depositions.

Plaintiff Johnson's motion is based on this Notice of Motion to Compel Discovery and Request for Sanctions, the Memorandum of Points and Authorities In Support of Plaintiff's Motion to Compel Discovery and Request for Sanctions, the Declaration of Samuel Bernard Johnson III In Support of Plaintiff's Motion to Compel Discovery and Request for Sanctions, the pleadings and records on file herein, and such additional materials and arguments as may be presented to the Court at or before the hearing on the Motion.

By way of this Notice of Motion to Compel Discovery and Request for Sanctions, , Plaintiff Johnson further respectfully requests that no oral arguments be conducted on this

pleading and any other pleadings that may be filed with the Court pertaining to this subject matter. Such is requested pursuant to Civil Local Rule 7-6.

Dated this 4th day of August 2008

/s/

SAMUEL BERNARD JOHNSON III